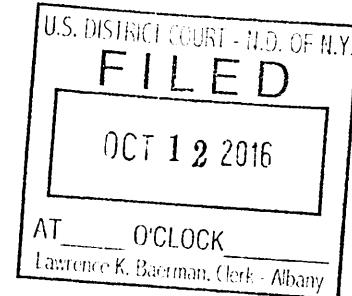


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.



THE GRAND JURY CHARGES:

COUNT 1

[Conspiracy to Possess with Intent to Distribute and to Distribute Cocaine]

From in or around May 2015 through on or about October 12, 2016, in Ulster County, in the Northern District of New York and elsewhere, the defendants, **MARCUS FISHER, a/k/a “Fish,” ROMELL HEARN, a/k/a “Rah,” “Mel,” RECARDO LANGSTON, a/k/a “Geezy,” JONATHON JONES, EUNICE ALLEN, a/k/a “Niecy,” JALEN ALLEN, a/k/a “J Skrap,” EMILIANO ALONSO, GUY CAIN, a/k/a “G,” JAMAL CLINTON, a/k/a “Moreless,” MARC DOUGLAS, KEVIN DRAKE, JOSE FRANCESQUINI, a/k/a “Feather,” GREG HARDY, MARK HOWARD, a/k/a “Double R,” CORDAL JOHNSON, “a/k/a “Ghetto Po,” PHILLIP KEITH, a/k/a “Beans,” KAREEM MCFARLANE, a/k/a “Manny,” ROBERT MEDLEY, a/k/a “Bob-O,” MICHAEL MONSANTO, a/k/a “MB,” RYAN RIOS, a/k/a “Ry,” DWAN SCAFE, a/k/a “West,” DIONN SPENCER, a/k/a “D,” LEONARD VANDYKE, a/k/a “Lenny,” DANIEL WILLIAMS, a/k/a “Lite,” and KEISHA WILLIAMS, and others, conspired to knowingly and intentionally possess with intent to distribute a controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 846.**

As to the defendants, **MARCUS FISHER, a/k/a “Fish,” ROMELL HEARN, a/k/a “Rah,” “Mel,” and RECARDO LANGSTON, a/k/a “Geezy,”** that violation involved five kilograms or more of a mixture or substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

As to the defendant, **JONATHON JONES**, that violation involved five hundred grams or more of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(B).

As to the defendants, **EUNICE ALLEN, a/k/a "Niecy," JALEN ALLEN, a/k/a "J Skrap," EMILIANO ALONSO, GUY CAIN, a/k/a "G," JAMAL CLINTON, a/k/a "Moreless," MARC DOUGLAS, KEVIN DRAKE, JOSE FRANCESQUINI, a/k/a "Feather," GREG HARDY, MARK HOWARD, a/k/a "Double R," CORDAL JOHNSON, a/k/a "Ghetto Po," PHILLIP KEITH, a/k/a "Beans," KAREEM MCFARLANE, a/k/a "Manny," ROBERT MEDLEY, a/k/a "Bob-O," MICHAEL MONSANTO, a/k/a "MB," RYAN RIOS, a/k/a "Ry," DWAN SCAFE, a/k/a "West," DIONN SPENCER, a/k/a "D," LEONARD VANDYKE, a/k/a "Lenny," DANIEL WILLIAMS, a/k/a "Lite," and KEISHA WILLIAMS**, that violation involved cocaine, a schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 2
[Possession with the Intent to Distribute Heroin]

On or about September 23, 2015, in Ulster County in the Northern District of New York, the defendant, **JALEN ALLEN, a/k/a "J Skrap,"** knowingly and intentionally possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 3
[Possession with the Intent to Distribute Cocaine]

On or about October 28, 2015, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a "Geezy,"** knowingly and intentionally possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 4

[Possession with the Intent to Distribute Controlled Substances]

On or about December 2, 2015, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a “Geezy,”** knowingly and intentionally possessed with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine and cocaine base (crack), Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 5

[Possession with the Intent to Distribute Controlled Substances]

On or about January 14, 2016, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a “Geezy,”** knowingly and intentionally possessed with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine and cocaine base (crack), Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 6

[Possession with the Intent to Distribute Cocaine]

On or about January 26, 2016, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a “Geezy,”** knowingly and intentionally possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 7

[Possession with the Intent to Distribute Cocaine]

On or about March 11, 2016, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a “Geezy,”** knowingly and intentionally possessed

with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 8
[Possession with the Intent to Distribute Cocaine]

On or about April 26, 2016, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a “Geezy,”** knowingly and intentionally possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 9
[Possession with the Intent to Distribute Cocaine]

On or about May 25, 2016, in Ulster County in the Northern District of New York, the defendant, **RECARDO LANGSTON, a/k/a “Geezy,”** knowingly and intentionally possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

COUNT 10
[Possession of a Firearm with an Obliterated Serial Number]

On or about August 1, 2016, in Ulster County in the Northern District of New York, the defendant, **JALEN ALLEN,** knowingly possessed a firearm which had had the manufacturers' serial number removed, obliterated, and altered and had been shipped and transported in interstate commerce, that is a Taurus, Model PT99, 9mm caliber pistol, with obliterated/defaced serial number, in violation of Title 18, United States Code, Sections 922(k) and 924(a)(1)(B).

COUNT 11
[Possession with the Intent to Distribute Cocaine]

On or about August 23, 2016, in Ulster County in the Northern District of New York, the defendant, **JALEN ALLEN, a/k/a “J Skrap,”** knowingly and intentionally possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

ALLEGATION REGARDING PREVIOUS FELONY DRUG CONVICTION

1. Count 1 of this Indictment is realleged and incorporated by reference.
2. Defendant **JONATHON JONES**, is subject to increased punishment, pursuant to Title 21, United States Code, Sections 846 and 841(b)(1)(B), because of the following prior convictions for felony drug offenses which have become final:

JONATHON JONES was convicted on or about February 4, 2008, in Ulster County Court of Criminal Sale of a Controlled Substance in the Third Degree (New York Penal Law Section 220.39(1)), a Class B felony, and was sentenced to 42 months of imprisonment.

JONATHON JONES was convicted on or about June 17, 1997, in Ulster County Court of Criminal Sale of a Controlled Substance in the Second Degree (New York Penal Law Section 220.41), a Class A felony, and was sentenced to 8 years to Life of imprisonment.

3. By virtue of said prior convictions, the defendant **JONATHON JONES** is subject to the enhanced penalty provisions in Title 21, United States Code, Section 851.

FORFEITURE ALLEGATIONS

The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853.

Pursuant to Title 21, United States Code, Section 853, upon conviction of an offense in violation of Title 21, United States Code, Section 846, the defendants, **MARCUS FISHER, a/k/a "Fish," ROMELL HEARN, a/k/a "Rah," "Mel," RECARDO LANGSTON, a/k/a Geezy," JONATHON JONES, EUNICE ALLEN, JALEN ALLEN, a/k/a "J Skrap," a/k/a "Niecy, EMILIANO ALONSO, GUY CAIN, a/k/a "G," JAMAL CLINTON, a/k/a "Moreless," MARC DOUGLAS, KEVIN DRAKE, JOSE FRANCESQUINI, a/k/a "Feather," GREG HARDY, MARK HOWARD, a/k/a "Double R," CORDAL JOHNSON, "a/k/a "Ghetto Po," PHILLIP KEITH, a/k/a "Beans," KAREEM MCFARLANE, a/k/a "Manny," ROBERT MEDLEY, a/k/a "Bob-O," MICHAEL MONSANTO, a/k/a "MB," RYAN RIOS, a/k/a "Ry," DWAN SCAFE, a/k/a "West," DIONN SPENCER, a/k/a "D," LEONARD VANDYKE, a/k/a "Lenny," DANIEL WILLIAMS, a/k/a "Lite," KEISHA WILLIAMS** shall forfeit to the United States of America any property constituting, or derived from any proceeds obtained, directly or indirectly, as the result of such offenses and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation alleged in Count 1 of this Indictment. The property to be forfeited includes but is not limited to, the following:

- a. A Money Judgment in the amount of no less than \$350,000.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value;

e. Has been commingled with other property which cannot be divided without difficulty.

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461.

Dated: October 12, 2016

A TRUE BILL,

REDACTED

Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:

Robert A. Sharpe
Robert A. Sharpe
Solomon B. Shinerock
Assistant United States Attorneys